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NEVADA BAR NO. 006212
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Attorneys for Defendants MATTHEW A. CATHCART
and CHERYLE T. CATHCART

**UNITED STATES DISTRICT COURT
DISTRICT NEVADA**

UNIVERSAL NORTH AMERICA
INSURANCE COMPANY,

Plaintiff,

vs.

MATTHEW A. CATHCART, individually;
CHERYLE T. CATHCART, individually; and
JOHN DOES 1-100, inclusive, and JANE
ROES 1-20, inclusive,

Defendants.

Case No.: 2:13-cv-01767-RCJ-GWF

STIPULATION AND ORDER TO ENLARGE TIME TO COMPLETE DISCOVERY
(SIXTH REQUEST)

The above-captioned parties, by and through their respective counsel of record, agree and stipulate that the discovery deadlines set in the Court's Order dated April 6, 2015, (Dkt. 58) be continued for a period of thirty (30) days, up to and including September 24, 2015, in order for the parties to complete the discovery.

A. DISCOVERY COMPLETED TO DATE:

1. Plaintiff and Defendants have produced their Initial Lists of Witnesses and Documents, as well as some supplements.
2. Defendants have been deposed.
3. Defendants have responded to written discovery propounded by Plaintiffs.

B. DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Additional written discovery;
2. Depositions of additional named parties;
3. Depositions of Third-Parties;
4. Depositions of percipient witnesses;
5. Disclosure of expert reports; and
6. Expert witness depositions.

C. REASONS REMAINING DISCOVERY WILL NOT BE COMPLETED WITHIN THE TIME LIMITS SET BY THE ORDER OF THE COURT DATED APRIL 6, 2015:

The parties' respective experts require additional time to produce their reports. Additionally, further discovery must be conducted prior to the expert disclosure deadline.

D. PROPOSED SCHEDULE FOR DISCOVERY COMPLETION:

- (a) That the current discovery cut-off date of August 24, 2015, shall be extended to **September 24, 2015**;
- (b) The initial expert disclosure deadline of June 24, 2015, shall be extended to **July 24, 2015**;
- (c) The rebuttal expert disclosure deadline of July 24, 2015, shall be extended to **August 24, 2015**;
- (d) The date for filing motions to amend the pleadings or to add parties of May 25, 2015, shall be extended to **June 24, 2015**;
- (e) The Interim Status Report due date of June 25, 2015, shall be extended to **July 24, 2015**;
- (f) The deadline to file all pretrial motions, including but not limited to discovery motions, motions to dismiss, motions for summary judgment and dispositive motions of September 24, 2015, shall be extended to **October 26, 2015**;

(g) The deadline to submit the Joint Pretrial Order of October 26, 2015, shall be extended to **November 25, 2015**; and

(h) The last day for the parties to file a motion and/or stipulation to extend discovery of August 20, 2015, shall be extended to **September 21, 2015**.

E. CURRENT TRIAL DATE:

There has not been a trial date set for this matter.

WHEREFORE, the parties hereto respectfully request that this Court enter an Order extending the current discovery dates for a period of thirty (30) days.

DATED this 5th day of June, 2015.

JUDD J. BALMER, ESQ., LTD.
A Nevada Professional Corporation

By: /s/ Judd J. Balmer
JUDD J. BALMER, ESQ.
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Attorneys for Defendants Matthew Cathcart & Cheryl Cathcart

DATED this 19th day of June, 2015.

OLSON CANNON GORMLEY ANGULO &
STOBERSKI

By: /s/ Walter R. Cannon
WALTER R. CANNON, ESQ.
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Las Vegas, Nevada 89129
Attorneys for Plaintiff UNIVERSAL NORTH AMERICA INSURANCE COMPANY

DATED this 19th day of June, 2015.

THORNDALL ARMSTRONG DELK
BALKENBUSH & EISINGER

By: /s/ Douglas J. Duesman
Douglas J. Duesman, Esq.
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1100 E. Bridger Avenue
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Attorneys for Third-Party Defendant American Residential Services, LLC, d/b/a Yes! Plumbing

DATED this 19th day of June, 2015.

MCKAY ROBBINS

By: /s/ Robert T. Robbins
Robert T. Robbins, Esq.
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Attorneys for Third-Party Defendant 24 Black Industries, LLC, d/b/a Absolute Flood Response & Construction

DATED this ____ day of June, 2015.

RESNICK & LOUIS, P.C.

By: /s/ Jenny L. Foley
Jenny L. Foley, Esq.
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Attorneys for Third-Party Defendant CRS Temporary Housing

IT IS SO ORDERED:


GEORGE FOLEY, JR.
United States Magistrate Judge

Dated: June 30, 2015